

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
Lori S. Bascome	:	Chapter 13
	:	
	:	
Debtor	:	Case No.: 19-11040-ELF

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Lori S. Bascome, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about February 20, 2019.
2. The Chapter 13 filing was assigned case number 19-11040-ELF.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about June 25, 2019.
4. On or about October 25, 2019, the Pennsylvania Department of Revenue filed their proof of claim.
5. The Debtor therefore requests to modify the confirmed Chapter 13 Plan, to include the late claim filed by the Pennsylvania Department of Revenue.
6. In furtherance of the Debtor including the Department of Revenue claim in her plan, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.
7. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "Exhibit A", includes the Pennsylvania Department of Revenue's proof of claim.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: November 7, 2019

/s/Brad J. Sadek, Esq.
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